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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

EUGENE BROOKS, III,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-00396-DJC-DMC

STIPULATION AND ORDER FOR  
SECOND EXTENSION OF TIME TO FILE  
THE ELECTRONIC CERTIFIED  
ADMINISTRATIVE RECORD AS THE  
ANSWER TO PLAINTIFF'S COMPLAINT

Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a thirty-one-day extension of time to respond to Plaintiff's Complaint in this case from May 16, 2025, up to and including June 16, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by May 16, 2025.

- 1 Defendant previously requested a forty-five-day extension of this deadline.
- 2 2. Despite working diligently to meet the case deadlines set forth in Federal Rules of
- 3 Civil Procedures, recently amended to add Supplemental Rules for Social Security
- 4 review cases under 42 U.S.C. § 405(g), Defendant needs additional time in the instant
- 5 case to prepare the certified administrative record for the Court's review.
- 6
- 7 3. For this reason, Defendant requests an extension to June 16, 2025 (31 days), to file an
- 8 Answer or other response in this matter.
- 9
- 10 4. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
- 11 he has no objection to this extension request.
- 12
- 13 5. This request is made in good faith and is not intended to delay the proceedings in this
- 14 matter.
- 15
- 16 6. I am attempting to preserve limited judicial resources and have applied the most rapid
- 17 response under the circumstances.

18 WHEREFORE, Defendant requests until June 16, 2025, to respond to Plaintiff's

19 Complaint.

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Respectfully submitted,

DATE: May 15, 2025

PRATO & REICHMAN, APC

/s/ Christopher James Reichman\*

CHRISTOPHER JAMES REICHMAN

Attorney for Plaintiff

(\*as authorized via email on May 14, 2025)

MICHELE BECKWITH

Acting United States Attorney

MATHEW W. PILE

Associate General Counsel

Office of Program Litigation, Office 7

Social Security Administration

DATE: May 15, 2025

By

s/ Justin L. Martin

JUSTIN L. MARTIN

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, it is so ordered.

Dated: May 15, 2025



DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE